

December 10, 2018

Sent via Electronic Mail and Overnight Courier

Director, Emergency and Remedial Response Division
Attn: Chief, New Jersey Remediation Branch, Pohatcong Site
United States Environmental Protection Agency Region 2
290 Broadway, 19th Floor
New York, New York 10007

New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency Region 2
290 Broadway, 17th Floor
New York, New York 10007
Attention: Attorney for Pohatcong Site

New Jersey Department of Environmental Protection
ATTN.: Fred Mumford
380 Scotch Road
West Trenton, New Jersey 08628
(*via electronic mail only*)

Re: Monthly Progress Report No. 26
Reporting Period November 1, 2018 through November 30, 2018
Operable Unit 3
Pohatcong Valley Groundwater Contamination Superfund Site
Warren County, New Jersey

Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, this monthly progress report is submitted in compliance with section X, paragraph 30 of the CD and section IV.A of the Statement of Work for Remedial Design and Remedial Action for Operable Unit 3 (OU3 SOW)² of the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. As required by

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

² Pursuant to Section VI. Paragraph 12.c(1) of the CD, USEPA approval of the OU3 SOW was received on June 26, 2017.

the OU3 SOW, this report provides a description of the actions and activities undertaken pursuant to the CD during this reporting period and plans, actions and data scheduled in the next eight weeks.

Actions Taken toward Compliance with Consent Decree, including Community Relations

The following activities were performed during this reporting period:

- A Supplemental Deed Notice was recorded in Warren County on November 8, 2018. This Supplemental Deed Notice was prepared in accordance with paragraphs 15A, 15B, and 15C of the original Deed Notice filed on April 9, 2015 in accordance with section V, paragraph 9a of the CD.
- The Monthly Progress Report for OU3 for the October 2018 reporting period was submitted to the USEPA on November 9, 2018.
- A meeting at the site was held on November 27, 2018 with Ramboll, Cascade, and Albea present for discussion of the upcoming PDI borings and 90% Remedial Design.
- A schedule for the planned supplemental soil borings to be performed inside the Main Production Area (MPA) of the Albéa Americas Washington facility during the scheduled plant shutdown from December 24, 2018 to January 1, 2019 was provided to USEPA in e-mail correspondence dated November 27, 2018.
- Comments on the *Draft Preliminary 30% Remedial Design Report* were received from USEPA in e-mail correspondence on November 28, 2018

Problems Encountered, Actions Taken and Their Resolutions

The following problems were encountered during this reporting period:

- None.

Analytical Results and Data Received During the Reporting Period

The following analytical data were received during this reporting period:

- None.

Modifications to the OU3 Work Plans or Schedules

The following modifications to Work Plans for OU3 or other schedules proposed to USEPA were submitted during this reporting period:

- None.

Anticipated Plans, Actions and Data Scheduled, including Community Relations (during the Next 8 weeks)

The following activities are planned for the next eight weeks:

- Installation and sampling of supplemental soil borings inside the (MPA) of the Albéa Americas Washington facility is planned for the scheduled plant shutdown from December 24, 2018 to January 1, 2019.
- Submittal of the *Draft Pre-Final (90%) Remedial Design Report* is planned for January 2019.

Estimate of the Percentage of the Work Completed

The following provides a qualified estimate of the percentage of the Work required by the CD that has been completed through this reporting period:

| Work to be Performed | Estimated Percent Work Completed |
|---|----------------------------------|
| Remedial Design | 50% |
| Remedial Construction and Implementation | 0% |
| Long-term operation and maintenance of the existing shallow SVE and sub-slab depressurization (SSD) systems | Ongoing |
| Long-term groundwater and indoor air monitoring | To be Determined ¹ |
| Institutional Controls | > 95% |

¹ Per Sections XI.A and XI.D of the OU3 SOW (Appendix B-3 to the CD), a plan for long-term groundwater monitoring and indoor-air sampling/remediation will be proposed in the RAWP and documented in the O&M Plan.

Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

- None.

Closing

Pursuant to section X, paragraph.30 of the CD, three hard copies of this monthly progress report have been submitted to the designated recipients. If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

Luis Hidalgo

Luis Hidalgo
Project Coordinator

cc: *via electronic mail*
Michelle Grainger – USEPA, Region 2
Jeff Armington – Rio Tinto
Bruce White – Barnes & Thornburg LLP
Bruce Kennington – Ramboll